

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SAMANTHA SOHMER, Individually and
on Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

UNITEDHEALTH GROUP INC.,
UNITED HEALTHCARE SERVICES,
INC., UNITED HEALTHCARE
INSURANCE COMPANY, OPTUM,
INC., and OPTUMRX, INC.,

Defendants.

Case No. 18-cv-03191(JNE/BRT)

**STATEMENT THAT ENTIRE
DOCUMENTS ARE
CONFIDENTIAL OR
IMPRACTICABLE TO REDACT**

Pursuant to Local Rule 5.6, the following exhibits to the Declaration of Michelle S. Grant (Dkt. 200) in support of Defendants’ Opposition to Motion for Class Certification have been filed under seal because the entire documents are confidential or redaction is impracticable:

Ex. 1	Dkt. 201	Compilation of Administrative Services Agreement between United Healthcare Insurance Company and Huntington Learning Corporation, dated October 1, 2008 (produced as UNH-Sohmer-06452591), and renewals and amendments thereto, including Financial Renewal and Terms Amendment, dated Oct. 1, 2016 (produced as UNH-Sohmer-06452621), Amended Non-Financial Terms, dated Oct. 1, 2012 (produced as UNH-Sohmer-06452629), Amendment to the Agreement, dated Oct. 1, 2014 (produced as UNH-Sohmer-06452630), Financial Renewal and Terms Amendment to the Administrative Services Agreement, dated Oct. 1, 2013 (produced as UNH000004092), Amendment to the Administrative Services Agreement, dated Feb. 17, 2010 (produced as UNH-Sohmer-06452631), Amendment to the Administrative Services Agreement, dated Jan. 1, 2009 (produced as UNH-Sohmer-06452633) (each marked “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY”)
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Ex. 5	Dkt. 201-1	Excerpts of the “Rx UAF” sheet from the Huntington Learning Corporation Underwriting Approval Forms, dated Oct. 1, 2012 (produced as UNH-Sohmer-07192100), Oct. 1, 2013 (produced as UNH-Sohmer-07192098), Oct. 1, 2014 (produced as UNH-Sohmer-07192097), Oct. 1, 2015 (produced as UNH-Sohmer-00000119), Oct. 1, 2016 (produced as UNH-Sohmer-06466951), Oct. 1, 2017 (produced as UNH-Sohmer-07044480), and Oct. 1, 2018 (produced as UNH-Sohmer-07044016) (each marked “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY”)
Ex. 6	Dkt. 201-2	Excerpts of Pharmacy Benefit Implementation Tools (“PhBITs”) for Huntington Learning Corporation, submitted Oct. 31, 2017 (produced as UNH-Sohmer-06961848 and marked “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY”)
Ex. 7	Dkt. 201-3	Excerpts of Pharmacy Benefit Implementation Tool (“PhBIT”) for Huntington Learning Corporation, printed May 16, 2018 (produced as UNH-Sohmer-00000120 and marked “CONFIDENTIAL”)
Ex. 8	Dkt. 201-4	PhBIT Pharmacy Network Field Translation Document, dated Jan. 21, 2016 (produced as UNH-Sohmer-07203166 and marked “CONFIDENTIAL”)
Ex. 9	Dkt. 201-5	Excerpts of Huntington Learning Corporation Pharmacy Financials, dated Oct. 1, 2015 (produced as UNH-Sohmer-00000182) and Oct. 1, 2016 (produced as UNH-Sohmer-00000183) (both marked “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY”)
Ex. 23	Dkt. 201-9	Expert Rebuttal Report of Ernst R. Berndt, PHD, dated Jan. 22, 2021

Dated: April 30, 2021

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